

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**Case No. 3:15-cr-00037
Judge Campbell**

[1] **DONALD DUANE BUCHANAN, JR.**)
 a/k/a "DONALD GAINS")
 a/k/a "RAY RHODES")
[2] **BENJAMIN EDWARD HENRY BRADLEY**)
[3] **FELICIA ANN JONES**)
 a/k/a "AUNTIE")
[4] **PAMELA O'NEAL**)
[5] **BERNADETTE BRADLEY**)
 a/k/a "BERNADETTE NICHOLE COLLEY")
[6] **GENE ROLAND HARDWICK**)
[7] **HOWARD BRONS III**)
[8] **ASHLEY KAYE ALDRIDGE**)
[9] **ANDREW BRADLEY FROOME**)
[10] **JAMES EDWARD JOHNSON II**)
 a/k/a "RED")
[11] **BOBBY DEANDRAE ROBERTSON**)
 a/k/a "B.O.")
[12] **JONATHAN LAMAR MOORE**)
 a/k/a "J-BOY")
[13] **ROBERT EDWIN HAMPTON**)
[14] **ERIC ANTHONY MCEWEN**)
 a/k/a "E")
[15] **TONY WADE HOLBROOKS**)
[16] **KAI ELIJAH RAMOS**)
[17] **WALTER THOMAS BOWEN, JR.**)
[18] **FRANK JEFFREY KELLY, JR.**)
 a/k/a "LITTLE MAN")

BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through David Rivera, United States Attorney for the Middle District of Tennessee, and Cecil VanDevender, Assistant United States Attorney, hereby

files the following Bill of Particulars for Forfeiture of Property.

In Forfeiture Allegation One, the Indictment seeks forfeiture of the following, upon conviction of Count One:

- A. pursuant to Title 21, United States Code, Section 853(a)(1), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of violation of Title 21, United States Code, Section 846, including but not limited to a money judgment in an amount to be determined, representing the amount of gross drug proceeds obtained as a result of such offense; and
- B. pursuant to Title 21, United States Code, Section 853(a)(2), any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

(DE# 3, Indictment, at PageID #: 11-12.)

In Forfeiture Allegation Two, the Indictment seeks forfeiture of the following, upon conviction of Count Two:

pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the violation of 18, United States Code, Section 1956(h) (conspiracy to commit money laundering), or any property traceable to such property including but not limited to proceeds of the violation and including but not limited to a money judgment in an amount to be determined, representing the property involved in a violation of 18, United States Code, Section 1956(h) (conspiracy to commit money laundering), or any property traceable to such property.

(*Id.* at PageID #: 13-14.)

THE UNITED STATES HEREBY GIVES NOTICE THAT, in addition to any property already listed in the Indictment's forfeiture allegations, the United States is seeking forfeiture of the following assets as to Forfeiture Allegation One:

CURRENCY:

1. Approximately \$46,300.00 United States currency seized from 15540 Prevost Street, Detroit, Michigan on March 12, 2015;
2. Approximately \$78,300.00 United States currency seized from 45669 Harmony Lane, Belleville, Michigan on March 12, 2015;
3. Approximately \$3,700.00 United States currency seized from 3001 Hamilton Church Road, #204, Antioch, Tennessee on March 12, 2015;
4. Approximately \$24,830.00 United States currency seized from a vehicle driven by Donald Buchanan, Jr. on Bell Road, Antioch, Tennessee on March 12, 2015;
5. Approximately \$6,000.00 United States currency seized from 15701 Prevost Street, Detroit, Michigan on March 12, 2015;
6. Approximately \$24,617.00 United States currency seized from 2426 East Main Street, Apt I-15, Murfreesboro, Tennessee on March 12, 2015; and
7. Approximately \$2,250.00 United States currency seized from inside a Ford Fusion registered to Andrew Froome and parked near 2426 East Main Street, Apt I-15, Murfreesboro, Tennessee on March 12, 2015.

THE UNITED STATES HEREBY FURTHER GIVES NOTICE THAT, in addition to any property already listed in the Indictment's forfeiture allegations, the United States is seeking forfeiture of the following assets as to both Forfeiture Allegation One and Forfeiture Allegation Two:

PERSONALTY:

1. Rolex watch with 18k rose gold/stainless face and 18k Everose gold/steel case seized from 3001 Hamilton Church Road, # 204, Antioch, Tennessee on March 12, 2015;
2. Rolex watch, Model Number 116505-BKSO, Daytona Oyster Professional Cosmograph, VL seized from 3001 Hamilton Church Road, # 204, Antioch, Tennessee on March 12, 2015;
3. Nixon Magnacon collection watch seized from 3103 Melissa Court, Smyrna, Tennessee on March 12, 2015;
4. Rolex watch, Model Number 116200RHDRDJ, Datejust Oyster men's luxury watch seized from 3103 Melissa Court, Smyrna, Tennessee on March 12, 2015; and
5. Frank Muller Tourbillon lady's watch seized from 3103 Melissa Court, Smyrna, Tennessee on March 12, 2015.

Respectfully submitted,

DAVID RIVERA
United States Attorney
Middle District of Tennessee

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2015, a copy of the foregoing Bill of Particulars was filed electronically. Notice of this filing will be sent to all persons registered, by operation of the Court's electronic filing system, as attorneys of record in this case

s/ Cecil VanDevender
Cecil VanDevender